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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL
CATALDO, EMIR GOENAGA, JULIAN
SANTIAGO, HAROLD NYANJOM,
KELLIE NYANJOM, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF ALEXANDER P.
FRAWLEY IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF PLAINTIFFS' MOTION
FOR RELIEF FROM CASE
MANAGEMENT SCHEDULE**

The Honorable Richard Seeborg
Courtroom 3 – 17th Floor
Date: December 9, 2021
Time: 1:30 p.m.

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' Administrative Motion to Seal Portions of Plaintiffs' Motion for Relief from Case Management Schedule ("Administrative Motion"). The Motion for Relief from Case Management Schedule references material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 70).

3. Plaintiffs respectfully request that the Court seal the redacted portions of the Motion for Relief from Case Management Schedule, attached to the Administrative Motion, including (i) portions of the Motion for Relief from Case Management Schedule, (ii) portions of the Declaration of Mark C. Mao in Support of the Motion for Relief from Case Management Schedule, and (iii) the entirety of Exhibits A-F to the Declaration of Mark C. Mao.

4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

5. I personally served a copy of this Declaration on Google's counsel of record by email on October 29, 2021. A Proof of Service is filed concurrently herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of October, 2021, at New York, New York.

/s/ Alexander P. Frawley